

SUMMONS

IN THE CIRCUIT COURT OF RALEIGH COUNTY, WEST VIRGINIA

RICHARD M. JANNEY,

PLAINTIFF,

v.

CIVIL ACTION NO. 15-C-732-k

JOHN D. BERRYMAN,

DEFENDANT.

To the above-named Defendant:

**JOHN D. BERRYMAN
200 VETERANS AVENUE
BECKLEY, WV 25801**

IN THE NAME OF THE STATE OF WEST VIRGINIA: You are hereby summoned and required to serve upon **ANTHONY M. SALVATORE**, plaintiff's attorney, whose address is **205 BROOKSHIRE LANE, BECKLEY, WV 25801**, an answer, including any related counterclaim or defense you may have, to the complaint filed against you in the above-styled civil action, a true copy of which is hereby delivered to you. You are required to serve your written answer with the Clerk of this Court, and with a copy of said answer served upon plaintiff's attorney within **TWENTY (20)** days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint and you will be thereafter barred from asserting in another action any claim you may have which must be asserted by counterclaim in the above-styled civil action.

Dated: July 30, 2015

Paul H. Garage
Clerk of Court

IN THE CIRCUIT COURT OF RALEIGH COUNTY, WEST VIRGINIA
RECEIVED AND FILED

RICHARD M. JANNEY, 2015 JUL 30 A 10:37

v. PAUL H. FLANAGAN

JOHN D. BERRYMAN, CIRCUIT CLERK

PLAINTIFF,

CIVIL ACTION NO. 15-C-7321C

DEFENDANT.

COMPLAINT

1. Plaintiff, Richard Janney, is a resident of Beckley, Raleigh County, West Virginia.
2. Defendant, John D. Berryman, is a resident of Daniels, Raleigh County, West Virginia.
3. On August 7, 2013, the Defendant, a co-worker of Plaintiff, made contact with the Plaintiff physically and caused personal injury to Plaintiff.
4. Contact made by Defendant toward Plaintiff caused Plaintiff physical and emotional injuries.
5. Said injuries are permanent in nature.
6. Plaintiff has incurred medical expenses as a result of said injuries.
7. Plaintiff in no way provoked Defendant on the aforesaid date.

WHEREFORE, the Plaintiff prays for judgement against the Defendant in an amount sufficient to compensate him for compensatory damages, reimbursement of medical expenses, and any other damages allowable by law.

RICHARD M. JANNEY

BY COUNSEL

HEWITT & SALVATORE, PLLC

for Plaintiff

Anthony M. Salvatore (WV Bar #7915)
Counsel for Plaintiff
asalvatore@hewittsalvatore.com
205 Brookshire Lane
Beckley, WV 25801
(304) 252-2207
(304) 252-2266 FAX